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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Karissa Jaylene Andrade,
Plaintiff,

vs.

Frank Bisignano, COMMISSIONER OF
SOCIAL SECURITY,
Defendant.

Case No. 1:25-cv-00124-SKO

**STIPULATION AND
UNOPPOSED MOTION FOR
EXTENSION OF TIME; ORDER**

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from July 17, 2025 to August 18, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGEMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

Plaintiff submits this third request for an extension of time, supported by good cause. The extension is necessary because Plaintiff is awaiting the updated OCR and linked Certified Administrative Record (CAR) from Defendant. Counsel needs additional time to thoroughly brief the issues for the Court's review. Defendant does not oppose this request. Plaintiff makes this request in good faith and without intent to delay the proceedings. Counsel apologizes to both the Court and Defendant for any inconvenience caused.

Respectfully submitted,

Dated: July 16, 2025

PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Dolly M. Trompeter
DOLLY M. TROMPETER
Attorneys for Plaintiff

Dated: July 16, 2025

MICHELE BECKWITH
Acting United States Attorney
MATTHEW W. PILE
Associate General Counsel
Office of Program Litigation, Office 7

By: */s/ Franco L. Becia
Franco L. Becia
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on July 16, 2025)

ORDER

Pursuant to the parties' foregoing stipulation and unopposed motion (Doc. 18), and for good cause shown (Fed. R. Civ. P. 16(b)(4)),

IT IS ORDERED that Plaintiff shall have up to and including August 18, 2025, to serve Plaintiff's Motion for Summary Judgment on Defendant. All other dates in the Scheduling Order (Doc. 4) are enlarged accordingly.

IT IS SO ORDERED.

Dated: **July 17, 2025**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE